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August 13, 2021

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

*Re: Jane Doe, et al. v. The Trump Corporation, et al., 1:18-cv-9936 (LGS)*

Dear Judge Schofield:

We write on behalf of Plaintiffs and the putative classes in the above-referenced action pursuant to the Court's August 4, 2021 Order (Doc. No. 315) to propose new deadlines for submissions ordered by the Court relating to certain non-party discovery served by Plaintiffs.

By way of brief background, on June 1, 2020, this Court entered an Order suspending all deadlines in this action following entry of an administrative stay by the United States Court of Appeals for the Second Circuit. (Doc. No. 282.) At the time that Order was entered, there were three approaching deadlines in place relating to non-party discovery issues:

- June 4, 2020 ACN to respond to Plaintiffs' May 27, 2020 letter (Doc. No. 274) concerning ACN's refusal to meet and confer with Plaintiffs. *See* May 28, 2020 Order (Doc. No. 276).
- June 4, 2020 Marketing Consultants and ACN to respond to Plaintiffs' May 27, 2020 letter (Doc. No. 274) concerning the Marketing Consultants' assertion that they are not obligated to produce any documents in response to Plaintiffs' subpoena after they unilaterally transferred their putative production to ACN. *See* May 28, 2020 Order (Doc. No. 276).
- June 18, 2020 Deadline for Plaintiffs and the MGM Entities to provide a joint update concerning progress on providing Plaintiffs access to relevant unaired footage from *The Celebrity Apprentice*. *See* May 26, 2020 Order (Doc. No. 273).

Plaintiffs respectfully propose that all three of these submissions be due two weeks from today, on August 27, 2021. In addition, Plaintiffs note that the Court had scheduled a conference for June 9, 2020, to address ACN's and the Marketing Consultants' respective discovery obligations, and Plaintiffs

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2

respectfully request that the Court consider rescheduling that conference for a date following the submission of ACN's and the Marketing Consultants' responses, as outlined above.

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Should the Court wish to hear from Plaintiffs sooner, we will of course proceed according to the Court's direction.

Respectfully submitted,



John C. Quinn

cc: Counsel of record (*via* ECF)